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December 10, 1993

**CTIA**

Cellular  
Telecommunications  
Industry Association  
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Third Floor  
Washington, DC 20036  
202-785-0081 Telephone  
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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1991 M Street, N.W. Room 222  
Washington, D.C. 20554

Re: Ex Parte Filing  
Docket No. 93-252 (Regulatory Parity)

RECEIVED

DEC 11 0 1993

Building The  
Wireless Future

Dear Mr. Caton:

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

This is to note that on December 10, 1993, per her request, the Cellular Telecommunications Industry Association ("CTIA") sent to Judy Argentieri, of the Tariff Division, a copy of the attached briefing book entitled "The ABCs of Cellular Competition."

The views expressed in this document reflects CTIA's position as previously filed in this proceeding.

If there are any questions in this regard, please contact the undersigned.

Sincerely,

  
Robert F. Roche

Attachment

No. of Copies rec'd 021  
List ABCDE

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## **THE ABCs OF CELLULAR COMPETITION**

### **A**

#### **Cellular Companies Compete On Price and Service Features**

With over 11 million customers now signed up for cellular service, carriers are aggressively competing for new subscribers. Cellular companies compete for customers on the basis of:

- ◆ service prices - which have fallen 29 percent since 1987
- ◆ hardware prices - which have fallen 44 percent since 1983
- ◆ targeted services and calling features
- ◆ service brand identification - MobiLink v. Cellular One
- ◆ service quality
- ◆ geographic service areas

### **B**

#### **Cellular Competes In A Larger Mobile Market**

Cellular services compete with other mobile services, e.g., paging, Specialized Mobile Radio (SMR), mobile satellite and mobile data, and upcoming Personal Communications Services. The emergence of new technologies, and new capabilities, and the convergence of mobile services will increase industry competition and benefit the public.

### **C**

#### **The Advertisements Speak For Themselves**

Cellular advertising demonstrates firsthand how carriers and manufacturers compete, and how cellular service competes with other mobile services, such as paging and SMR.





## A Cellular Companies Compete On Price and Service Features

Like most new communications services, cellular was originally used by businesses (and individuals) who needed the service regardless of cost. As penetration of that market grew, however, cellular carriers have become more aggressive in marketing and pricing in order to attract the "average" customer. Carriers have had to adopt strategies to compete for consumers -- competing both with other cellular carriers and with other mobile services on the basis of:

- ◆ service prices
- ◆ hardware prices
- ◆ targeted services and calling features
- ◆ service brand identification - MobiLink v. Cellular One
- ◆ service quality
- ◆ geographic service areas

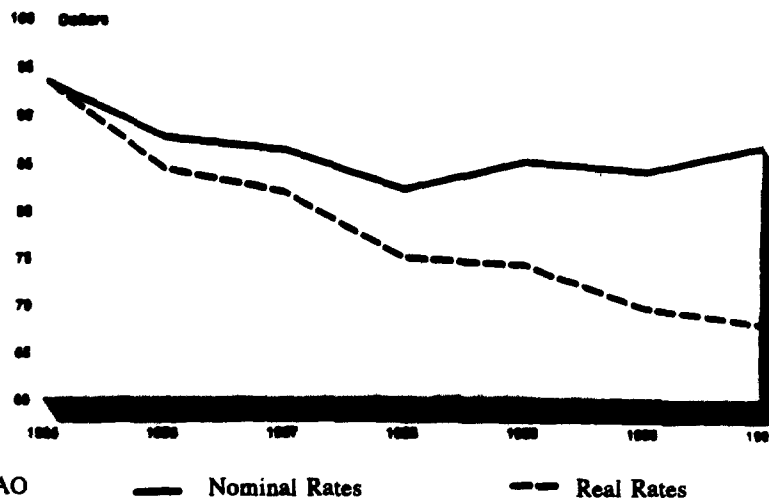
This effort has been a success, with more than 11 million subscribers now signed up for cellular service. Affordable and innovative cellular equipment and services are appealing to a growing consumer market. In fact, non-business users were a major source of cellular growth in 1992, and personal use of cellular grew to equal business use by the end of 1992.

The net result of this increased competition: cellular costs to the consumer are dropping.

### Real Service Prices Are Declining Dramatically

The General Accounting Office has noted that real rates for airtime declined 27 percent from 1985 to 1991 for typical users.

### AVERAGE BEST PRICE FOR 150 MINUTES IN THE TOP 30 CELLULAR MARKETS

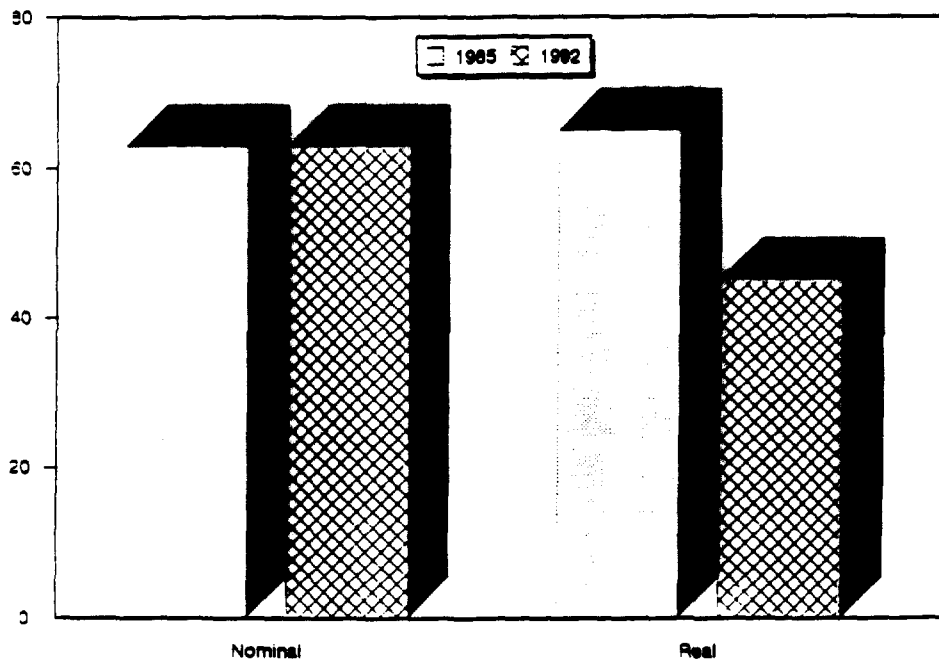


Four recent cellular competition studies -- by Charles River Associates, Economic and Management Consultants International (EMCI), Dr. Jerry Hausman of MIT and Dr. Alan Pearce

of Information Age Economics -- found that cellular prices have declined over time, providing the public with lower rates and diverse plans attuned to distinct usage levels and patterns.

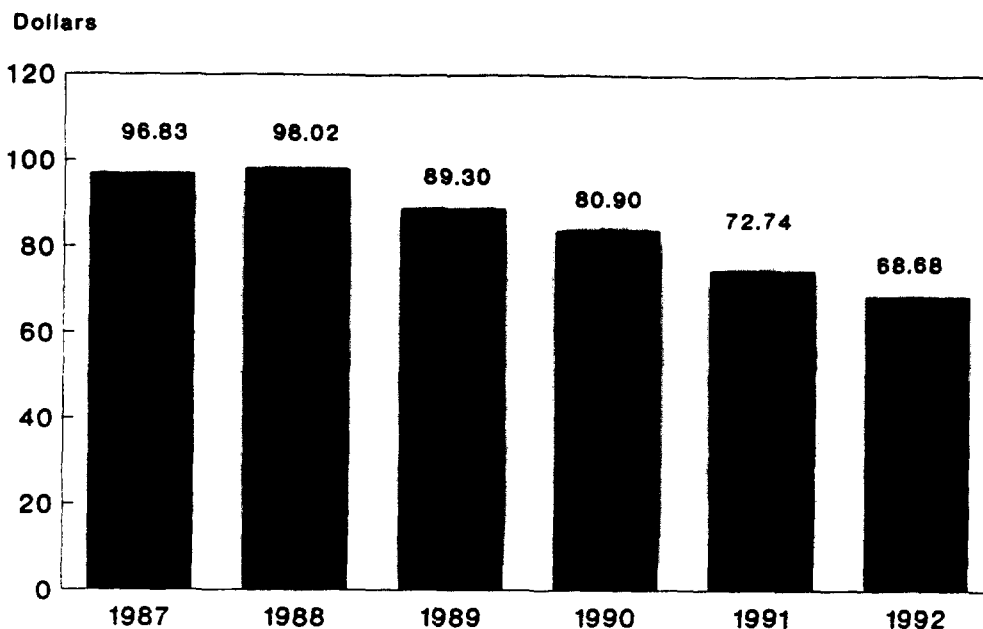
For example, EMCI found that the effective monthly cost of cellular dropped 29 percent from 1985 to 1992 for customers with 100 Minutes of Use a month.

#### NOMINAL & REAL CELLULAR SERVICE PRICE CHANGES, 1985 and 1992



CTIA's year-end 1992 survey of cellular carriers reported that the average local monthly bill for subscribers is \$68.68, down from \$96.83 in 1987.

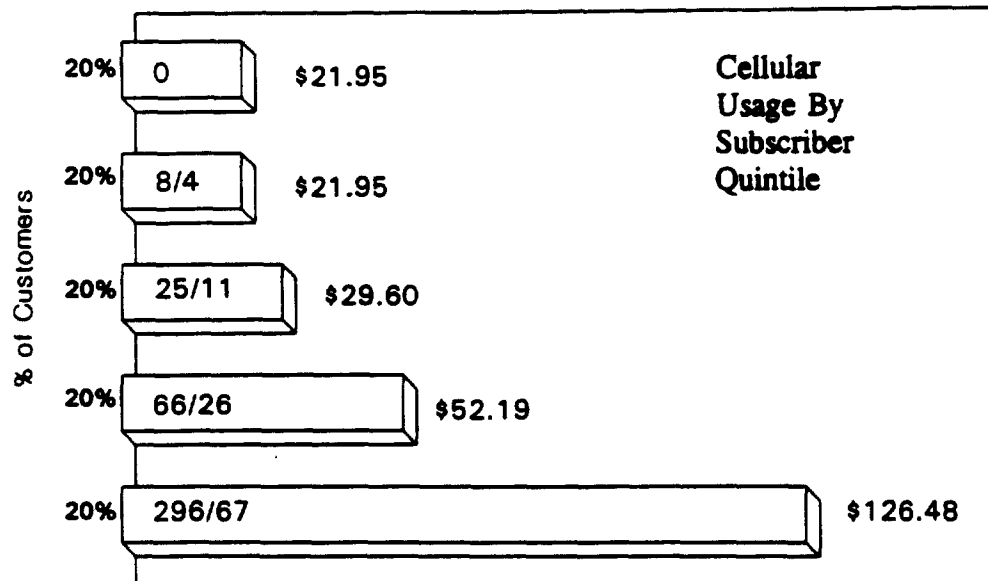
#### AVERAGE MONTHLY LOCAL BILLS ARE FALLING



In fact, an analysis by Bell Atlantic Mobile of cellular pricing plans and usage in the top 30 MSAs across the nation shows that by using the right service plan, 60 percent of cellular customers could pay less than \$30 per month. (Even cheaper "safety" or "security" plans are available, for as little as \$ 9.95 a month.)

*The Bell Atlantic Mobile analysis indicates that 80 percent of cellular customers could pay less than \$52.19, and only the top 20 percent (the most frequent) users could pay as much as \$126.48 a month for service.*

#### **MOST CELLULAR CUSTOMERS CAN PAY LESS THAN \$ 30 A MONTH**



Service Plans were chosen randomly from "wireline" and "nonwireline" cellular carriers in the top 30 MSAs to represent service plan offerings for occasional, moderate, and frequent users. Some carriers offer even less expensive plans for these groups. Peak/Off-Peak Minutes of Use are shown for each quintile.

#### **Low Equipment Prices and Packages**

Price competition involves more than airtime rates. For example, many companies -- like Ameritech, Cellular One, InterCel, and others -- compete through the offering of bundled packages, with incentives such as free activation, free minutes of use, discounts or credits on a cellular phone, or free phones.

NYNEX Mobile offers a "Simplicity Pricing Plan" which guarantees the customer the best rate for their calls by automatically adjusting per minute rates and monthly access charges according to their usage. Other carriers, such as Cellular One, offer discounts to encourage subscribers to add mobile phones to their existing accounts.

Such discounts, and packaged offerings, provide a significant competitive benefit to customers. Charles River Associates, experts in telecommunications economics, in a November 1992 study commissioned by CTIA, found that there has been a **44% drop in the cost of owning and operating a cellular phone** since 1983.

The Federal Communications Commission (FCC) has concluded that "there appear to be significant public interest benefits associated with the bundling of cellular [equipment] and service" -- reducing barriers to new customers, spreading fixed costs over a larger customer base, and promoting more efficient use of spectrum and conversion to digital. *Cellular Bundling Report and Order*, 7 FCC Rcd. 4028, 4030-31 (1992).

In their filings with the FCC, both the Department of Justice and the Federal Trade Commission's Bureau of Economics concurred that bundling in the cellular industry is pro-competitive. The Department concluded bundling "provides consumers with [equipment] and cellular service at a significantly lower total price than they would likely receive if bundling were prohibited."

### **New Services and Features**

Cellular companies compete for customers on the basis of new services and features, including targeted plan options.

For example, PacTel Cellular recently announced it will offer six "Ultra-Value" plans which include enhanced features such as Call Waiting, Call Forwarding, Conference Calling and Enhanced Message Manager at no charge or a reduced charge.

Such "vertical" or enhanced service options, including Three-Way Calling, Follow-Me Roaming, and Voice Mail Services, provide the same advantages to mobile customers that are enjoyed by fixed location customers. Calls can be directed to other locations, and the called party can deal with multiple calls, or combine calls.

GTE's Follow-Me Roaming offers a particular advantage, forwarding calls to customers when they are away from their local serving area, without requiring the caller to do more than dial the customer's usual mobile number.

U S WEST Cellular also recently announced its offering of enhanced Digital Messaging Service features, including short text message display, voice mail message alert, and call-back capabilities.

### **Service Brand Identification -- MobiLink v. Cellular One**

Service "branding" -- establishing a name brand identification -- is also a significant competitive factor. The Cellular One service brand name was established to promote a nationwide identification of cellular service provided by McCaw Cellular and other Cellular One licensees. This vision of a seamless, nationwide high-quality service identity provided a competitive advantage to the marketers of Cellular One service.

More recently, the service brand "MobiLink" was established, providing name brand identification for cellular services provided in Canada and the United States by 15 companies, including ALLTEL Mobile, Ameritech Mobile, Bell Atlantic Mobile, BellSouth Mobility, Cellular Inc., Centel Cellular (now Sprint Cellular), Century Cellunet, GTE MobileNet,

Mobility Canada (itself a consortium owned by the 12 B-side carriers of Canada, such as BCE Mobile Communications, Edmonton Telephones, etc.), NYNEX Mobile, PacTel Cellular, Rochester Tel Mobile, SNET Cellular and U S WEST Cellular.

The MobiLink service includes simplified and uniform dialing plans and codes, consistent easy to use features, and broad service coverage, with assurances of call quality and responsive customer service across North America.

### **Service Quality**

Carriers make blunt service quality comparisons in their advertising, as they compete head-to-head. And competition has driven carriers to improve their service offerings through increased investment and interaction with customers.

As Dr. Jerry Hausman has noted, cellular carriers compete significantly on the basis of service quality, as techniques are developed and deployed to reduce interference and decrease the number of blocked or dropped calls.

In fact, U S WEST Cellular recently announced that in the Seattle/Puget Sound market it is offering a feature called Mobile Reported Interference, or MRI, which will help reduce interference and prevent dropped calls, through a continual monitoring of the phone's contact with the cell site. The MRI feature will promote a smooth hand-off of the phone call to a cell site with a stronger signal when it begins to detect interference.

### **Geographic Service Areas**

Different calling areas can offer customers the benefit of a larger area in which home area billing rates will apply instead of roaming or toll charges. Companies such as Comcast Metrophone, Southwestern Bell Mobile Systems, Unicel and the United States Cellular Corporation have all stressed the size of their cellular coverage areas in their marketing efforts. Cellular One in California has stressed the availability of home rates instead of roaming or long distance charges.





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## **B Cellular Competes In A Larger Mobile Market**

Cellular companies do not exist in a vacuum. Cellular companies compete with each other, and with other mobile communications services, including **paging**, **Specialized Mobile Radio (SMR)**, **mobile satellite** and **mobile data**, and emerging Local Exchange Carrier services. The Advanced Intelligent Network (AIN) services and Personal Communications Services (PCS) promise to increase competition.

### **Experts Agree That Cellular Companies Compete Aggressively**

- ◆ *Charles River Associates*, experts in telecommunications economics, conclude that the cellular industry displays significant competition. They note the swift pace of technological change within the industry, which allows carriers to offer new and different benefits and services to their customers, produces rapid changes which make it impossible for competing carriers to coordinate rate structures and fix prices. Of particular note:
  - ◆ subscribership has been growing at an annual rate of about 40 %
  - ◆ rates have declined as the number and variety of offerings has increased
- ◆ *Dr. Jerry A. Hausman*, MacDonald Professor of Economics at the Massachusetts Institute of Technology, also concludes that competition in the cellular industry is significant, with nonwireline cellular companies catching up with and even surpassing wireline-affiliated carriers in the total number of subscribers. Also noteworthy are the facts that:
  - ◆ in competing for new customers, cellular carriers offer price discounts averaging 33 %
  - ◆ price competition in the form of multiple pricing plans has produced decreases in the effective price for cellular of 10-to-12% per year over the past five years, after adjustment for inflation
- ◆ *Economic and Management Consultants International (EMCI)*, a firm specializing in econometric analysis of the telecommunications industry, estimates that 21.6 percent of subscribers switch to the competing cellular carrier annually, inspired by price and service competition. Rapid customer growth among price sensitive personal users also acts as a further competitive force in the cellular industry.
- ◆ *Dr. Alan Pearce of Information Age Economics* has also found that cellular carriers are not able to set service rates at will, with rates falling as cellular carriers face competition both within the cellular industry and from other telecommunications services.

- ◆ The reality of this competition is underscored by changing market share and customer churn. As *Herschel Shosteck Associates* notes, in the Detroit market alone, market share shifted between the two cellular carriers as follows:

<u>Detroit Market Share</u>		
	1987	1991
PacTel	51.2 %	40.5 %
Ameritech	48.8 %	59.5 %

### **Cellular Will Increasingly Compete With Other Mobile and Emerging Services**

EMCI has concluded that technological changes are enhancing the functionality and capacity of paging and SMR, with Advanced Paging and Digital Enhanced SMR enjoying a convergence of capabilities and prices which makes increased competition with cellular possible. These changes, plus the consolidation of paging and SMR operators, have improved their access to capital and provide administrative economies which improve their competitive posture.

### **Specialized Mobile Radio Is A Growing Competitive Force**

SMR providers frankly admit they compete with cellular. Fleet Call has avowed its intention to become the "third major provider of mobile communications" in its markets. It has described its "imminent entry into the wireless communications marketplace in Southern California," with the intent to offer "mobile telephone, alphanumeric paging, dispatch and mobile data communications" with "features comparable to those offered by today's cellular systems." Questar Telecom has also asserted that it "will create a new corporation that is large enough to convert SMR properties into ESMR cellular mobile phone systems. The new digital systems provide an alternative for cellular mobile phone systems."

To achieve their competitive goals, SMR providers have adopted strategies and technologies which will enhance their competitive position in the mobile marketplace. Recent examples include the consolidation of operations by SMR providers to create a mass market. For example:

- ◆ Fleet Call purchased Dispatch Communications (DisCom) in December 1992, and in early 1993 agreed to acquire a majority interest in American Mobile Systems (AMS). This combination of the second, third and fourth largest SMR operators -- providing the latest digital mobile services -- will directly compete with cellular services in a service area encompassing over 107 million people. The new Fleet Call system (under the NEXTEL name) will include an East coast market stretching from Maine to Virginia, a West coast market encompassing 82% of California's population, a Southern market covering Florida, and Western and Midwestern markets including Texas and Chicago.

The combined Fleet Call challenge is powerful and imminent: the Los Angeles system will come on-line in August 1993, and the East coast (New York and Mid-Atlantic) digital mobile system is planned to begin operation in late 1994 or early 1995.

◆ Other SMR providers are also preparing to enter the Enhanced SMR market, with companies such as Dial Page preparing to offer digital SMR service in its existing markets (including Florida, North and South Carolina, Georgia, Tennessee and Virginia).

◆ Questar Telecom and Advanced MobileComm Inc. have also agreed to merge their operations. Their merger will form the third largest SMR provider, with operations in 11 Western and Southwestern states (including Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington and Wyoming) with a population of more than 25 million.

◆ A consortium of other SMR providers also plans to form a competitive "seamless system" in which customers will be able to roam within their wide regional service area. And Motorola, the largest SMR provider, has announced it intends to deploy digital mobile technology in 50 of its own SMR markets by the end of 1993.

All of these companies have obtained significant amounts of financing, and guarantees of backing, which combine with the hard assets of digital networks and the high capacity gained from frequency re-use plans to form powerful assets in the competitive mobile marketplace.

### **Paging Is A Competitive Player**

Paging is also competitive among price-sensitive consumer users and will become more so as advanced paging service proposals shift paging's capabilities closer to the two-way capabilities of cellular (e.g., via acknowledgement messaging and voice capabilities). Like SMRs, the paging industry is enjoying improved access to capital markets, with market capitalization rising to \$ 1.2 billion by October 1992.

### **Personal Communications Services Promise To Compete In The Larger Market**

Personal Communications Services (PCS) promise to compete with the broad range of mobile services in the larger mobile communications market. At its best, PCS will not be limited to competing with cellular carriers' current service offerings.

In fact, only the narrowest vision of PCS is limited to providing competition to cellular voice services. PCS can also: (1) provide a wireless infrastructure that can compete with the local telephone/cable companies' hardwired local loop in offering Narrowband/Broadband Network services, and/or (2) offer a wide range of broadband applications, including new high speed data, video and multimedia services in competition with cable and computer companies' Broadband Data/Video Services.



Sara Krulwich/The New York Times

Morgan E. O'Brien, left, and Brian D. McAuley of Fleet Call Inc. in Rutherford, N.J.

## A Challenge to Cellular's Foothold

By ANTHONY RAMIREZ

Those static-filled radios used to dispatch cab drivers may be on the verge of becoming a mode of communication for the masses — and a potentially powerful competitor to the \$9 billion cellular industry.

Fleet Call Inc. is at the forefront of a new industry trying to combine mobile radio and new digital technology to build a network nearly indistinguishable from that of the cellular industry, which serves more than 11 million customers.

"Two years from now we're talking about Fleet Call as the MCI of mobile communications," said John L.

Bauer 3d, an analyst at Prudential Securities, who recommends the stock.

As with cellular phones, subscribers will be able to use pocket-size phones to call anywhere in the world from Fleet Call's territory. But Fleet Call, based in Rutherford, N.J., says its technology, adapted from satellite transmission, will provide the clear, static-free service of digital coding and more features for customers — though its phones are likely to be more expensive than cellular phones.

Since 1987, the company has been buying up mobile-radio licenses in big cities. But only recently did it receive approval from the Federal Communications Commission to apply digital

technology to mobile radio, which will make the system competitive with cellular. The technology, known as Enhanced Specialized Mobile Radio, expands Fleet's limited mobile radio service sixfold, allowing it to reach as many as 600,000 subscribers, twice the number that an analog cellular system can now reach.

Specialized mobile radio is "not just a squawk box anymore," said Morgan E. O'Brien, chairman of Fleet Call.

Fleet Call expects to be the first to offer the enhanced service, beginning in August in Los Angeles, the biggest

Continued on Page C5

# Challenge to Cellular Telephone's Footnold

Continued From First Business Page

cellular market. The service will be called Nextel, and the company plans to change its name to Nextel Communications later in the spring, assuming shareholder approval.

Next year, Fleet Call hopes to expand service to its other markets — New York, San Francisco, Chicago, Dallas and Houston. Another company, Geotek Industries of Ramsey, N.J., is using another enhanced digital technology, developed by the Israeli military to foil enemy jammers, to expand its reach. But it is aiming at a narrower business market.

Fleet Call has not yet determined its prices, but it presumably intends to keep them competitive with cellular rivals. Yet Fleet Call says its service will be better than cellular's.

### Counters Cellular Drawback

In addition to telephoning, mobile radio can offer built-in paging and electronic mail on a number-and-letter display in handsets developed by Motorola.

Such an arrangement helps solve one of the biggest irritations of cellular phones — customers must pay for incoming as well as outgoing calls. Consequently, most cellular customers turn off their phones most of the time to avoid paying for calls from people they do not want to speak with.

With built-in paging, a mobile-radio customer gets an inexpensive paging beep and a display showing a short message and telephone number. A mobile-radio caller can thus decide to call the boss back right away, without incurring the high prices of cellular.

## Mobile-radio networks are enhanced by new technology.

The savings can be considerable. The typical paging bill costs \$7 to \$10 a month, compared with a cellular bill of \$80 or more.

For cellular carriers, retooling already extensive networks with built-in paging would be difficult and expensive. Fleet Call and other mobile-radio carriers can simply build in these capabilities from the start.

But unlike cellular, the Fleet Call system cannot offer "roaming" service outside its home markets because the F.C.C. gave mobile-radio carriers far less electromagnetic spectrum, the radio signals that make wireless transmission possible, than their cellular counterparts. Even when Fleet Call's system is fully deployed, its customers must make do with islands of service rather than the national networks that McCaw Cellular Communications and the regional Bell companies are building.

That may not be a problem, however, because most customers most of the time use their phones in their home territories.

A more pressing problem is that the mobile-radio handsets may be far more expensive than cellular phones, whose price has been dropping rapidly to as low as \$200. Without the millions of cellular customers to help reduce manufacturing costs, the new mobile-radio sets could be hundreds of dollars more expensive.

Fleet Call was founded in 1987 by investors who were present at the creation of the enhanced mobile-radio market. Mr. O'Brien is a former lawyer with the F.C.C., and Brian D. McAuley, is a former controller at Norton Simon Inc.

At the F.C.C., Mr. O'Brien was instrumental in organizing the mobile-radio market in the 1970's. Mr. McAuley is a certified public accountant and was senior vice president at Millicom Inc., a telecommunications company with a big paging business.

With an eye toward applying digital technology to mobile radios, the two men raised millions of dollars from the public and venture capitalists to buy numerous licenses in big cities. Each license provided enough radio signal for only a few hundred subscribers, but by buying scores of them, Fleet Call amassed enough radio signal capacity for a few thousand subscribers.

In 1991, it successfully lobbied the F.C.C. to use the digital techniques to expand capacity of the radio spectrum — a plan cellular carriers strenuously opposed.

A recent merger agreement will make Fleet Call by far the dominant

mobile radio carrier and give it coverage in cities and towns with a population of 95 million. Later this spring, Fleet Call, the No. 2 company in the mobile-radio industry, is set to complete the acquisition of Dispatch Communications, the No. 3 carrier, for about \$320 million. Fleet Call will add Dispatch's 48,000 customers to its 146,000 customers.

A merger agreement earlier this week for \$50 million will add even more potential subscribers from the Florida territories of American Mobile Systems Inc.

Wall Street is taking notice, mainly because Fleet Call's acquisition costs, or the right to offer service, works out to as little as \$4 for each potential subscriber, compared with up to \$200 for cellular purchases in recent years. Even assuming significant management mistakes, Fleet Call could still make money because its costs are so low, analysts say.

Fleet Call is worth much more than its stock price, based on cash flow and other factors, according to Mr. Bauer of Prudential. He estimates Fleet Call's asset value per share at \$47, and assigns it a 12-month target price of \$33 a share. Fleet Call gained \$1.375 in Nasdaq trading yesterday, closing at \$28.375.

In the year ended March 31, 1992, Fleet Call posted revenue of \$52.5 million but had a loss of \$28.4 million because of start-up costs and one-time accounting charges. It is likely to have continuing losses or scant profits for the near future because of acquisitions and special charges.

All forms of wireless phone service depend on radio signals. A typical two-way radio broadcast, as in a walkie-talkie conversation, occupies an entire channel, in much the same way a television program occupies an entire television channel.

In specialized mobile radio, a single powerful transmission tower broadcasts to a fleet of moving radio receivers, like those in cabs, delivery trucks and police cars.

In building its network, Fleet Call plans to use time-division multiple access. The technique resembles broadcasting a television program on, say, Channel 4 at three one-second intervals with three television sets receiving the program at three different times. This technique gives each subscriber his own static-free channel with no one else listening in.

The second technique, frequency hopping multiple access, is also a digital method. Radio signals hop around like a couch potato madly changing channels. It is similar to broadcasting a television program in bits and pieces on 13 separate channels, with the television set automatically changes channels so that the viewer does not notice the switching.

This technique, commercially developed by Geotek, grew out of Israeli military technology to foil enemy radio jammers. Geotek plans to aim its service at corporate customers, like delivery services, and expects service in Philadelphia in August 1994.



## **C The Advertisements Speak For Themselves**

Cellular advertising falls into clear categories, as the companies compete for the customers on the basis of:

- ◆ service prices
- ◆ hardware prices
- ◆ targeted services and calling features
- ◆ service brand identification - MobiLink v. Cellular One
- ◆ service quality
- ◆ geographic service areas

And cellular companies compete with:

- ◆ other mobile services



## Service Price Competition

**\$9.95**<sup>+</sup>/mo  
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*Small price for a little peace of mind.*

Only UNICEL® has a \$9.95 emergency rate plan.

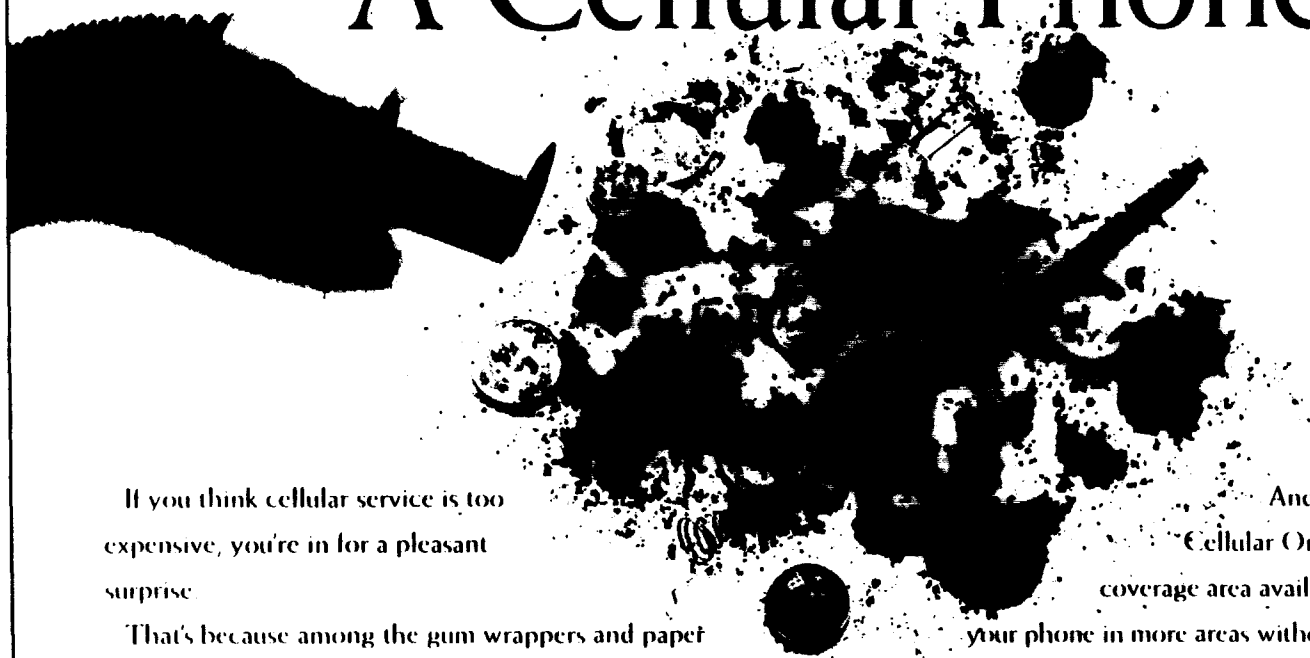


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# Where Can You Find The Daily Cost Of Using A Cellular Phone?



If you think cellular service is too expensive, you're in for a pleasant surprise.

That's because among the gum wrappers and paper clips in your car seat, you probably have enough loose change for a day's worth of cellular service.

You see, the typical Cellular One subscriber pays less than two dollars a day for service and monthly fees. Imagine, for the price of pocket change, you can have the use of a cellular phone.

And because the service is from Cellular One, you'll receive the largest coverage area available. You'll also be able to use your phone in more areas without expensive roaming charges.

To find out how you can get cellular service for less than two dollars a day, call us at 424-0400. Or stop by our offices at 4230 8th Street in Wisconsin Rapids. Then, vacuum out your car. And you just might discover what it takes to get cellular service that won't clean out your wallet. **CELLULARONE®**

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To make this comparison even easier, Americitech will give you a \$150 service credit on airtime if you sign up by March 31. And if you're a business customer, be sure to ask about our special discounts for high-volume callers. No matter how you look at it, Americitech is Chicagoland's best cellular value.

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1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

## Hardware Price Competition

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**Get the NYNEX 832 Plus  
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You can purchase one of the most popular car phones in the market today - the NYNEX 832 Plus - for just \$199.\* It's an unbeatable phone at an unbeatable price.

And what makes it even more attractive is that the 832 is jam-packed with features. There's 16-digit memory. Hands-free microphone. A three-year manufacturer's warranty.

And we'll even install your phone and give you your choice of antenna.

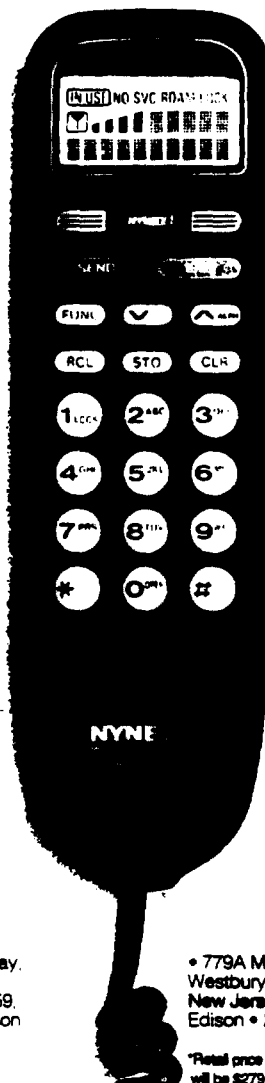
Now through April 17th, this package is available to new customers who sign up with the Annual Simplicity Pricing Plan.

A great price for a great phone.

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NYNEX Cellular Center  
or call 1-800-443-BELL.**

New York Cellular Centers: 65-18 Fort Hamilton Parkway, Brooklyn • 31-31 Thomson Avenue, Long Island City • 22 Carmans Road, Massapequa • 300 West Route 59, Nanuet • 30 West End Avenue, New York • 310 Madison Avenue, New York • 555 West 37th Street, New York

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Get up to 100 minutes of talk time during your first full month - free. That's 100 minutes well spent on your business, but not on your pocket book. Close that big deal. Talk to the kids. All on us. This offer is good for new customers who sign up with the Annual Simplicity Pricing Plan by April 17th.\*\*

And when you sign up with Simplicity, you're signing on the best pricing plan in the New York Metro area. Unlike other calling plans, it doesn't make you commit to a specific calling level. Instead, it automatically adjusts to your calling patterns. That saves you money.

So get the edge that will keep you one step ahead of the competition.

Get the NYNEX Mobile Edge.

**NYNEX**  
Mobile Communications @

• 779A Middle Country Road, St. James • 363 Union Avenue, Westbury • 222 Bloomingdale Road - Suite 114, White Plains.  
New Jersey Cellular Centers: 655 Route 1 & Wooding Avenue, Edison • 2490 Route 22, Union.

\*Retail price of NYNEX 832 Plus for customers who do not enroll in Annual Simplicity will be \$279. \*\*Minutes must be used during your first full billing cycle.

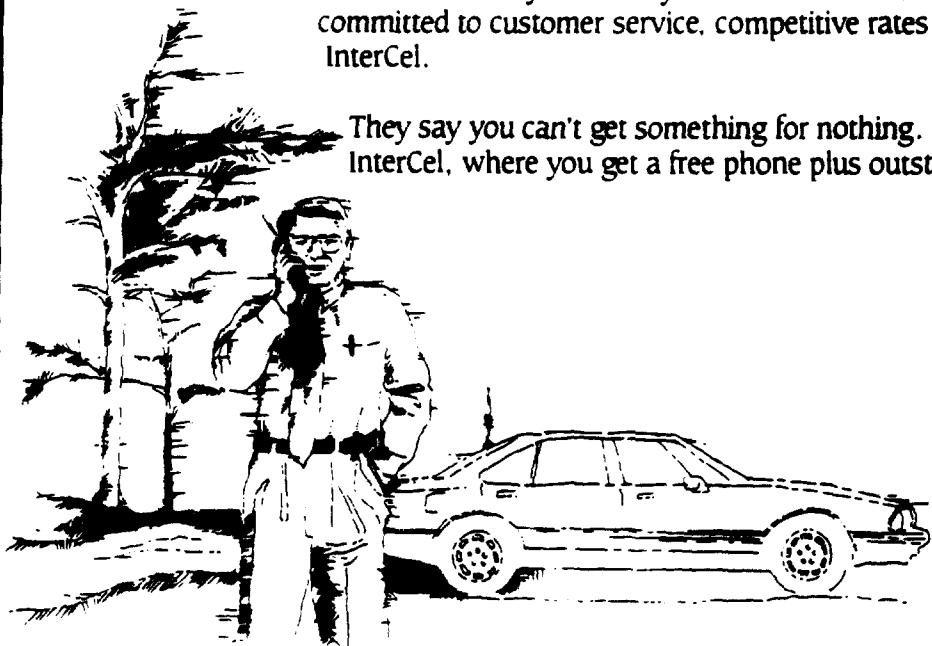
## **QUESTIONS YOU SHOULD ASK WHEN CHOOSING CELLULAR SERVICE**

# **"HOW CAN I GET A FREE CELLULAR TELEPHONE?"**

When you sign up for cellular service with InterCel, you can receive a free cellular telephone. If you sign a 36-month service agreement on any one of four service plans, you get a \$350 credit you can apply to purchasing a cellular telephone. And not just any phone. That covers the cost of a Uniden car-to-car phone with battery OR a Uniden mobile phone to be mounted in your car—phones so good they have a three-year warranty.

Sound too good to be true? High-quality Uniden phones are noted for their features and durability. And it's yours with cellular service from a company committed to customer service, competitive rates and local ownership: InterCel.

They say you can't get something for nothing. "They" haven't been to InterCel, where you get a free phone plus outstanding cellular service.



**QUALITY CELLULAR COMMUNICATIONS**

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**THIS SALE POSITIVELY ENDS DECEMBER 31**

**Panasonic**  
YEAR END SAVINGS



Reg.  
\$179

**100 IN  
ACCESSORIES  
FREE**

**100 IN  
ACCESSORIES  
FREE**

**INCLUDES  
FREE  
AIRTIME**



Reg.  
\$269

**100 IN  
ACCESSORIES  
& INSTALLATION  
FREE**

**CHASCO  
INSTALLED  
AIRTEL  
CELLULAR  
PHONE**

**\$69.95**  
INCLUDES  
FREE  
AIRTIME



Reg.  
\$349

**100  
ACCESSORIES  
FREE**

**CHASCO  
INSTALLED  
AIRTEL  
CELLULAR  
PHONE**

**\$109.95**  
INCLUDES  
FREE  
AIRTIME



**TELEPHONE  
WAREHOUSE**  
FOR CELLULAR SALES AND SERVICE CENTER



**OPEN SUNDAY - FT. WORTH** ■ 377-8400 ■ 6521 Camp Bowie across from Bennigan's  
S. FT. WORTH ■ 246-8400 ■ 4917 S. Hulen across from Wards Auto Cntr.  
S. ARLINGTON ■ 239-8400 ■ 4261 W. Green Oaks Blvd. 1/2 mile N. I-20  
N. RICHLAND HILLS ■ 577-8400 ■ 7827 Grapevine Highway (Hwy. 26)  
N. ARLINGTON ■ 640-8400 ■ 2436 E. Randol Mill Rd. 1 blk. west of 340

This offer requires a new two year annual commitment with MetroCell through Telephone Warehouse and a one-time \$15 programming fee. Offer Expires 12/31/92